

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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In the Matter of the Application of San Diego Gas & Electric Company and Southern California Gas Company for Authority to Integrate Their Gas Transmission Rates, Establish Firm Access Rights, and Provide Off-System Gas Transportation Services

A.04-12-004

**REPLY COMMENTS OF THE
CALIFORNIA MANUFACTURERS & TECHNOLOGY ASSOCIATION**

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November 27, 2006

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In accordance with Rule 14.3 of the Rules of Practice and Procedure, the California Manufacturers and Technology Association (CMTA) hereby submits its reply comments in this matter.

In its opening comments, CMTA requested that the PD be modified in the following three respects: (1) unbundle the FAR reservation charge; (2) eliminate the Step 1 set-aside for EG customers with long-term commitments on upstream pipelines; and (3) set the receipt point capacity limitation in Step 2 based upon 75% of the customer's base period usage.

The unbundling of the reservation charge not only is supported by the other co-sponsors of the Unbundled FAR proposal (Watson Cogeneration, CCC and the Indicated Producers), but also drew support from other parties in their opening comments. BHP Billiton stated in its comments that if LNG developers do not receive a credit of the reservation fee, it supported adoption of the unbundled 16 cent rate of the Unbundled FAR proposal. It requested that the unbundled charge of 16 cents be substituted for the 5 cent fee proposed by SDG&E and SoCalGas (Comments of BHP Billiton at 9). Similarly, SES Terminal argued that unbundling of the reservation charge from the transmission rate represents a "straight forward, simple and

logical way to cure all of the defects of the proposed reservation charge” (Comments of SES Terminal at 9). SES Terminal supported an unbundled charge of 5 cents. Clearly, the unbundled approach makes sense to many different parties and eliminates the problems inherent in the crediting back feature of the utilities’ proposal. CMTA supports adoption of the cost-based unbundled charge of 15.75 cents per Dth proposed by Mr. Beach but, as an alternative, would accept an unbundled rate of 5 cents per Dth as the starting point for the FAR program.

With regard to the Step 1 set-aside for EG customers, the opening comments submitted on behalf of Kern River Gas Transmission Company express support for the set-aside. Kern’s support is understandable since the bulk of the gas that would be eligible for the set-aside is delivered by Kern at Wheeler Ridge and Kramer Junction.¹ Although Kern’s economic self-interest is understandable, the EG set-aside remains unjustified. Unlike other noncore customers for whom a Step 1 set-aside is appropriate, the EG customers have made no long-term commitment to SoCalGas. Thus, the set-aside cannot be justified as part of the “benefit of bargain” as is the case with the Oxnard 3 contracts and California gas producers. In their opening comments, SoCalGas and SDG&E also oppose the Step 1 set-aside for these EG customers, noting that it would be unduly discriminatory against other noncore customers and is completely unnecessary from a reliability standpoint (SoCalGas/SDG&E Comments at 6). Overall, the Step 1 set-aside for these EG customers could vitiate the FAR program at the outset, since no capacity may be available to other market participants at Kramer Junction and very little would be available at Wheeler Ridge. Many customers are likely to choose not to participate in the FAR program if most of the desirable capacity has already been taken “off the board” before the Step 2 procedure is implemented.

¹ See, Opening Comments of CMTA, Table 2.

With respect to the PD's modification of the Step 2 capacity limitation, SoCalGas/SDG&E point out that the effect of the "historic utilization by month" provision would be to further limit the ability of customers to bid in Step 2. Taken in conjunction with the EG set-aside, these provisions of the PD would further discourage noncore customers and other market participants from obtaining FARs. Although one of the key purposes of the FAR program is to provide maximum flexibility to market participants, the historic utilization feature would greatly reduce or eliminate much of that flexibility at the outset. CMTA urges that the 75% limitation based on base period usage at each receipt point be retained.

The opening comments of SCGC and Coral consist of a rehash of their arguments as to why a FAR system is not needed or would be disruptive to the market. Suffice it to say that there is ample evidence in the record to refute these claims and that the PD fully considered and properly rejected these arguments. At this point, no further consideration of the SCGC and Coral arguments is warranted.

A number of parties addressed the Joint Proposal in their opening comments. Sempra LNG contends that the PD should be clarified to eliminate the pro rata allocation of displacement capacity at Otay Mesa as provided for in Section 7.b of the Joint Proposal (Exhibit A of Exhibit 85) which the PD adopted. CMTA opposes the "clarification" sought by Sempra LNG. Clearly, the Step 1 set-aside for displacement capacity at Otay Mesa diminishes the amount of capacity available for the rest of the Southern Zone. The *pro rata* reduction of the scheduling rights provided for Otay Mesa in Joint Proposal is the bare minimum that should be adopted to protect the interests of other customers and market participants in the Southern Zone. Better yet, the Step 1 set-aside for displacement capacity at Otay Mesa should be eliminated entirely. It is noteworthy that SoCalGas and SDG&E recently filed an application (A.06-10-034) for authorization to receive 50 MMcf per day of deliveries at Otay Mesa needed to meet growing

demand in San Diego and Riverside Counties. The immediate need for capacity at Otay Mesa – long before the arrival of LNG supplies – should have been an issue to be explored in this proceeding. For example, in light of this application, should the core receive a Step 1 set-aside at Otay Mesa? The timing of the filing of this application after the close of the record in this proceeding can hardly be viewed as mere coincidence.

In its comments, TURN argues that a party who has funded expansion capacity should only pay the cost of the expansion and should not have to pay for FARs. CMTA is opposed to TURN's suggestion. Paying only for the expansion capacity and nothing for the existing system is unfair to existing customers who have paid, and are paying, for the existing system. By the same "logic," new industrial and EG customers should only have to pay for their interconnection costs and receive free transportation on the system. Without the existing system, expansion capacity would be worthless in most cases. Therefore, parties who fund expansions should also contribute to the cost of the existing system through the FAR program.

CMTA respectfully requests that the Commission modify the PD in accordance with recommendations set forth in its opening and reply comments.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing "Reply Comments of the California Manufacturers & Technology Association" upon each person designated on the official service list compiled in this proceeding.

Dated at Washington, D.C. this 27th day of November, 2006.



Jodi Martz

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